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9	LPG Liquidation Trust					
10 11	UNITED STATES BANKRUPTCY COURT					
12	CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION					
13						
14	In re	Case No: 8-23-bk-10571-SC				
15		Chapter 11				
16 17 18	THE LITIGATION PRACTICE GROUP P.C.,  Debtor.	STIPULATION TO MODIFY BRIEFING SCHEDULE AND TO CONTINUE HEARING ON MOTION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM FILED BY UNITED PARTNERSHIPS, LLC [DK. NO 671]				
19		Current Hearing and Response Dates				
20 21		Hearing Date: May 22, 2025 Trustee's Response Due: May 8, 2025 Reply by Claimant Due: May 15, 2025				
22		Time: 11:00 a.m. Ctrm: Courtroom 5C 411 West Fourth Street				
23		Santa Ana, CA 92701				
24		Proposed Hearing and Response Dates Hearing Date: August 21, 2025				
25		Trustee's Response Due: August 7, 2025 Reply by Claimant Due: August 14, 2025				
26		Time: 11:00 a.m. Ctrm: Courtroom 5C				
27		411 West Fourth Street Santa Ana, CA 92701				
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	STIPULATION TO MODIFY BRIEFING SCHEDULE RE: UNITED PARTNERSHIPS					

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TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

Richard A. Marshack, the duly appointed Chapter 11 Trustee ("Trustee") for the estate ("Estate") of The Litigation Practice Group, P.C. ("Debtor" or "LPG") and liquidating trustee of the LPG Liquidation Trust (collectively, "Trustee"), and United Partnerships, LLC ("UP" and together 6 with Trustee, "Parties") with regard to the following:

## **RECITALS**

- On March 20, 2023, the Debtor filed a voluntary petition under Chapter 11 of Title 11 A. of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States Bankruptcy Court for the Central District of California, Santa Ana Division.
- On May 8, 2023, Richard A. Marshack was appointed as the Chapter 11 Trustee of B. the Estate. Docket No. 65.
- C. On November 16, 2023, UP filed a Motion for Allowance of Administrative Claim Pursuant to 11 U.S.C. § 503 ("Motion"). Docket No. 671.
- On January 5, 2024, Trustee filed a Motion to Continue Hearing on the motions for D. 16 allowance of administrative expense claims. Docket No. 816.
- On January 8, 2024, the Court entered an Order granting the Trustee's Motion to E. 18 Continue Hearing, continuing the initial hearings on all matters to February 29, 2024, and treating those hearings as status conferences. Docket No. 818.
- On February 15, 2024, Trustee filed an Omnibus Unilateral Report Regarding Status F. of Motions for Allowance of Administrative Expense Claim Under 11 U.S.C. Section 503(b). 22 Docket No. 940.
- 23 On March 6, 2024, the Court entered a Scheduling Order, setting April 11, 2024, as G. 24 the deadline for Trustee to respond to any of the motions for allowance of administrative expense claims for a specific group of claimants, including UP. Docket No. 986.
- On April 4, 2024, the Parties entered into a Stipulation to Modify the Briefing 26 H. 27 || Schedule and Continue Hearing on Motion for Allowance of Administrative Expense Claim filed by 28 United Partnerships, LLC. ("April 4 Stipulation"). Docket No. 1087.

- On April 5, 2024, the Court entered an order approving the April 4 Stipulation. I. Docket No. 1089.
- Thereafter, the Court entered orders approving further stipulations between Trustee J. and UP to continue the hearing on the Motion. See Docket Nos. 1188, 1265, 1422, 1812, 1940, 2059, 2141.
  - The hearing is currently scheduled for May 22, 2025, at 11:00 a.m. K.
- The Trustee has continued diligently investigating UP's claim. Trustee has requested L. further documentation from UP, specifically documentation tracing the benefit it provided to the Debtor's Estate. The Trustee is concurrently investigating post-petition payments the Debtor made to UP and any possible related avoidance power claims.
- M. UP has served subpoenas and filed notices of subpoenas to Amazon Web Services, 12 | Debt Pay Pro, Zoom Video Communications, Inc., LunaCRM, Morning Law Group, P.C. and Resolution Processing, LLC. See Dks. 1412, 1414, 1431, 1473. UP advises that it has not yet received responses to all of these subpoenas.
- N. On October 22, 2024, UP subpoenaed the Trustee for a production of several 16 categories of documents and electronically stored information. See Dk. 1848. Thereafter, the Trustee timely complied.
  - In light of their ongoing investigations, the Parties have agreed to a further Ο. continuance of the hearing on the Motion and related briefing schedule by approximately 90 days.

The Parties STIPULATE as follows:

- The hearing on the Motion shall be continued from May 22, 2025 at 11:00 a.m., to 1. 22 | August 21, 2025, at 11:00 a.m.
- The deadline for Trustee to file a response to the Motion shall be extended through 2. 24 and including August 7, 2025.
  - The deadline for UP to file a reply to Trustee's response to the Motion shall be 3. extended through and including August 14, 2025.

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1	4. This Stipulation may be executed in one or more counterparts, and facsimile or				
2	electronic signatures may be used in filing this document with the Court.				
3					
4	DATED: May 6, 2025 MARSHACK HAYS WOOD LLP				
5	- Island F. Dalland				
6	By: /s/ Aaron E. De Leest D. EDWARD HAYS				
7	AARON E. DE LEEST ALINA MAMLYUK				
8	Attorneys for Chapter 11 Trustee, RICHARD A. MARSHACK				
9	RICHARD A. WARSHACK				
10	DATED: May 6, 2025 GOLDEN GOODRICH LLP				
11	By:				
12	DAVID M. GOODRICH Attorneys for				
13	UNITED PARTNERSHIPS, LLC				
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	STIPULATION TO MODIFY BRIEFING SCHEDULE RE: UNITED PARTNERSHIPS				

## PROOF OF SERVICE

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled (*specify*): <u>STIPULATION TO MODIFY BRIEFING SCHEDULE</u>
<u>AND TO CONTINUE HEARING ON MOTION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM FILED BY UNITED PARTNERSHIPS LLC</u> will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

equired by LBR 5005-2(	d); and <b>(b)</b> in the manner stated below	:	
Orders and LBR, the fore <b>05-07-2025</b> , I che	THE COURT VIA NOTICE OF ELECTION  going document will be served by the cked the CM/ECF docket for this bank on the Electronic Mail Notice List to re-	court via NEF and hyperlin ruptcy case or adversary p	k to the document. On roceeding and determined that
		⊠ Service informati	ion continued on attached page
addresses in this bankrup envelope in the United St	STATES MAIL: On, I served of the control of t	placing a true and correct c and addressed as follows.	copy thereof in a sealed Listing the judge here
DEBTOR – MAIL REDI THE LITIGATION PRAC 17542 17TH ST SUITE 100 TUSTIN, CA 92780-198	CTICE GROUP P.C.	Complete informati	ion continued on ottoched page
		Service informati	ion continued on attached page
F.R.Civ.P. 5 and/or contr delivery, overnight mail s and/or email as follows.	NAL DELIVERY, OVERNIGHT MAIL, olling LBR, on <u>05-07-2025</u> , I see ervice, or (for those who consented in Listing the judge here constitutes a decorate than 24 hours after the docume	erved the following persons writing to such service met claration that personal deliv	and/or entities by personal hod), by facsimile transmission
VIA PERSONAL DELIM PRESIDING JUDGE'S HONORABLE SCOTT O UNITED STATES BANK 411 WEST FOURTH ST COURTROOM 5C SANTA ANA, CA 92701	COPY C. CLARKSON KRUPTCY COURT FREET, SUITE 5130 /		
		☐ Service informati	ion continued on attached page
declare under penalty o	f perjury under the laws of the United S	States that the foregoing is	true and correct.
<b>May 07, 2025</b> Date	Sabrina Gridley Printed Name		a Gridley

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- Case 8:23-bk-10571-SC Doc 2412 Filed 05/07/25 Entered 05/07/25 20:24:01 Desc
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